

LAW OFFICES OF DALE K. GALIPO
Dale K. Galipo (Pro Hac Vice Ca. Bar No. 144074)
dalekgalipo@yahoo.com
Eric Valenzuela (Pro Hac Vice Bar No. 284500)
evalenzuela@galipolaw.com
21800 Burbank Boulevard, Suite 310
Woodland Hills, California 91367
Tel: (818) 347-3333 | Fax: (818) 347-4118

GONZALEZ & FLORES LAW FIRM
Rodolfo Gonzalez, Esq. (NV Bar No. 12751)
Rodolfogonzalezlaw@gmail.com
Edgar Flores, Esq. (NV Bar No. 13130)
Edgarfloreslaw@gmail.com
879 N. Eastern Ave.
Las Vegas, NV 89101
Tel: 702-778-3030 | Fax: 702-920-8657

CLAGGETT & SYKES LAW FIRM
Sean Claggett, Esq. (NV Bar No. 008407)
Sean@claggettlaw.com
Steve Lewis, Esq. (NV Bar No. 7064)
Steve@claggettlaw.com
4101 Meadows Lane, Suite 100
Las Vegas, NV 89107
Tel: 702-655-2346 | Fax: 702-655-3763
Attorney for Plaintiffs

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA (LAS VEGAS)**

JEANNE LLERA and JORGE L.
GOMEZ, as the appointed co-special
administrators of the estate of JORGE A.
GOMEZ; JEANNE LLERA; and JORGE
L. GOMEZ,

Plaintiffs,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT; RYAN FRYMAN; DAN
EMERTON; VERNON FERGUSON;
ANDREW LOCHER; and DOES 1-10,
inclusive,

Defendants.

Case No. 2:20-cv-01589-RFB-BNW

[Honorable Brenda Weksler]

**STIPULATION AND ORDER
REQUESTING INFORMAL
DISCOVERY CONFERENCE**

1 The parties, by and through their counsel of record, hereby stipulate and
2 request that the Court conduct an informal discovery conference to resolve a discovery
3 dispute that has recently arisen. The parties request this informal discovery
4 conference to seek the Court's guidance on the issue in attempts to resolve this
5 discovery dispute without the need to bring a motion to compel.
6
7

8 The discovery dispute involves the production of the LVMPD's Critical
9 Incident Review Team ("CIRT") Administrative Report, including its findings and
10 conclusions. The CIRT report is currently being withheld by the Defendants on the
11 grounds that it is protected by the Deliberative Process Privilege. Plaintiffs assert that
12 the CIRT report is not privileged and directly relevant to establishing Plaintiffs'
13 claims, especially their *Monell* claims based on an unconstitutional custom and
14 practice and for ratification (Plaintiffs' 5th and 7th claim in the First Amended
15 Complaint [Doc. # 21]).
16
17

18 WHEREFORE, the parties respectfully request that this Court conduct an
19 informal discovery conference on April 2, 2021, at 11:00 AM in attempts to resolve
20 the parties' discovery dispute.
21

22 To access the conference, the parties will dial 877-810- 9415 and enter access code
23 "2365998" when prompted. Further, by March 29, 2021, the parties will submit a single 5-
24 page document containing a brief overview of the parties' discovery dispute. The
25 document should be authored by both counsel. If the parties cannot come to an
26 agreement regarding what to include in the 5-page document, they may each file their own
27 5-page document.
28

1 IT IS SO STIPULATED this 16th day of March, 2021.

2 MARQUIS AURBACH COFFING

LAW OFFICES OF DALE K. GALIPO

3 By: s/ Craig R. Anderson

By: s/ Eric Valenzuela

4 Craig R. Anderson, Esq.

Eric Valenzuela, Esq.

5 Nevada Bar No. 6882

CA Bar No. 284500 (Pro Hac Vice)

6 10001 Park Run Drive

21800 Burbank Blvd., Suite 310

7 Las Vegas, Nevada 89145

Woodland Hills, CA 91367

Attorneys for Defendants

Attorneys for Plaintiffs

8
9 IT IS SO ORDERED this 22nd day of March, 2021.

10
11 

12 Hon. Brenda Weksler

13 United States Magistrate Judge
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28